



PhytoPharmica[®]

NATURAL MEDICINES[™]

September 10, 2003

1997 03 OCT 16 22:05 SEP 15 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

RE: Label Claims/Disclaimers

Dear Mr. Moore:

This letter is to notify you that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), at 825 Challenger Drive, Green Bay, Wisconsin 54311 is a distributor and has included statements provided for by section 403(r)(6) of the Food, Drug, and Cosmetic Act on the labels of the following product. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

COMPANY	PRODUCT NAME	DIETARY INGREDIENTS	STATEMENTS
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Probiotic Pearls [™]	Proprietary Probiotic Blend Lactobacillus acidophilus and Bifidbacterium longum	Probiotics do not permanently colonize in the body. Therefore, they need to be ingested regularly for their health-promoting effects to persist.* Since they are often killed or severely weakened by exposure to air while on the shelf, and by stomach acids when in the body, probiotics need to be protected until they can reach the intestine, where they offer maximum benefits.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

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Probiotic Pearls 21p

85909
825 CHALLENGER DRIVE
GREEN BAY, WI 54311-8328
920-469-9099
TOLL FREE 800-553-2370
FAX 920-469-4418
FAX TOLL FREE 888-311-5657
WWW.PHYTOPHARMICA.COM

By: Robert Doster

Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/10/03

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,



Michael P. Devereux
Chief Financial Officer



PhytoPharmica[®]

NATURAL MEDICINES[™]

September 9, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
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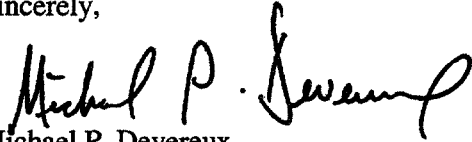
<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Probiotic Pearls [™]	Proprietary Probiotic Blend Lactobacillus acidophilus and Bifidbacterium longum	The third layer is a patented coating that protects the probiotics from the acid environment of the stomach, so they can successfully reach the intestine where they are needed.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

By: 
Robert Doster
Title: Senior Vice President of Scientific Affairs
Date: 9/9/03

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

A handwritten signature in black ink, reading "Michael P. Devereux". The signature is fluid and cursive, with the first name "Michael" and last name "Devereux" clearly legible, and "P." as a small initial in the middle.

Michael P. Devereux
Chief Financial Officer



September 11, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
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Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

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<u>COMPANY</u>	<u>PRODUCT NAME</u>	<u>DIETARY INGREDIENTS</u>	<u>STATEMENTS</u>
PhytoPharmica (a Division of Integrative Therapeutics, Inc.)	Probiotic Pearls™	Proprietary Probiotic Blend Lactobacillus acidophilus and Bifidbacterium longum	These heart smart products from Enzymatic Therapy support your cardiovascular system.*

I certify that the information contained in this notice is complete and accurate and that PhytoPharmica, (a Division of Integrative Therapeutics, Inc.), has substantiation that the statements are truthful and not misleading.

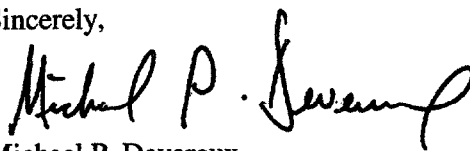
By: 
Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 9/11/03

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,


Michael P. Devereux
Chief Financial Officer